

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

SHANTE WATSON,

Plaintiff,

v.

GEORGIA AUTO PAWN, INC.,

Defendant.

Civil Action No. 1:25-cv-906-LMM

JOINT MOTION FOR ENTRY OF STIPULATED PROTECTIVE ORDER

Plaintiff Shante Watson and Defendant Georgia Auto Pawn, Inc. (“GAP”), by and through undersigned counsel, and pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, jointly request that the Court enter the attached Stipulated Protective Order for the protection and exchange of confidential information produced in this action. In support of this motion, the parties show the Court the following:

The parties are engaged in discovery, and Plaintiff has requested information that GAP considers to be confidential financial, proprietary, or commercially-sensitive information that would qualify for protection under Rule 26(c) of the Federal Rules of Civil Procedure. The entry of this stipulated order will expedite and facilitate the discovery of information, which is otherwise confidential or proprietary in nature, for purposes of this litigation.

WHEREFORE, the parties respectfully request that the Court consider and enter the attached Stipulated Protective Order.

Respectfully submitted, this 9th day of October, 2025.

/s/Anthony I. Paronich (w/express
permission)

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LOCAL RULE 7.1 CERTIFICATE OF COMPLIANCE

I hereby certify that the foregoing pleading filed with the Clerk of Court has been prepared in 14-point Times New Roman font in accordance with Local Rule 5.1(C).

Dated: October 9, 2025.

/s/Ava J. Conger
Ava J. Conger

CERTIFICATE OF SERVICE

I hereby certify that on October 9, 2025, I electronically filed the foregoing **JOINT MOTION FOR ENTRY OF STIPULATED PROTECTIVE ORDER** with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to all attorneys of record

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